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Attorneys for Defendant Transatlantic Reinsurance Company

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ILEANA DIAZ,

Plaintiff,

vs.

TRANSATLANTIC REINSURANCE COMPANY

Defendant.

1:16-cv-01355 (GBD)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Marc E. Bernstein, both dated April 19, 2016, and the exhibits attached thereto; and all other pleadings, papers, and proceedings had herein, Defendant Transatlantic Reinsurance Company will move this Court, located at the United States Courthouse, 500 Pearl Street, New York, New York, on May 10, 2016, or as soon thereafter as counsel may be heard, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Plaintiff's First and Seventh Causes of Action with prejudice and for such other and further relief that the Court deems just and proper.

Dated: New York, New York
April 19, 2016

PAUL HASTINGS LLP

/s/
By: Marc E. Bernstein

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